

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

JOSE ANGEL DIAZ,

Debtor.

CHAPTER 13 CASE

NO. A07-65559-MHM

JOSE ANGEL DIAZ,

Movant,

vs.

LOUIS STEVEN GOLDMAN,

Respondent.


NOTICE OF REQUIREMENT OF RESPONSE TO MOTION
TO AVOID JUDICIAL LIEN ON EXEMPT PROPERTY AND TIME TO FILE SAME

NOTICE IS HEREBY GIVEN that a Motion to Avoid Judicial Lien on exempt property pursuant to 11 U.S.C. Section 522 has been filed in the above case.

NOTICE IS FURTHER GIVEN that pursuant to BLR-6008-2, NDGA, the Respondent must file a response to the Motion within twenty-three (23) days after service, exclusive of the day of service, and serve a copy of same on Movant and Movant's attorney. In the event that no response is timely filed and served, the Bankruptcy Court may enter an Order granting the relief sought.

This 11th day of May, 2007.

Respectfully submitted,
JEFF FIELD & ASSOCIATES



R. JEFFREY FIELD
Attorney for Debtor
State Bar No. 259670

342 North Clarendon Avenue
Scottdale, Georgia 30079
404-499-2700

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Respondent.

MOTION TO AVOID JUDICIAL LIEN

Debtor, JOSE ANGEL DIAZ, by and through his attorney, moves for an Order Avoiding Judicial Lien held by the Respondent, Louis Steven Goldman, pursuant to 11 U.S.C. Section 522(f) and alleges as follows:

1.

Respondent obtained a Judgment against the Debtor on or about January 23, 2007 and said Judgment was filed on the General Execution Docket, Book 676, Page 99, in the Superior Court of Fulton County, Georgia in the original amount of \$40,594.57.

2.

Respondent holds a claim against the Debtor in the amount of \$40,594.57, representing the balance due on the foregoing Judgment.

3.

Pursuant to O.C.G.A. 44-13-100, the Debtor is entitled to an exemption of \$10,600.00 in real and personal property.

4.

The judicial lien of Respondent impairs exemptions allowed under O.C.G.A. 44-13-100 which are claimed by the Debtor herein.

5.

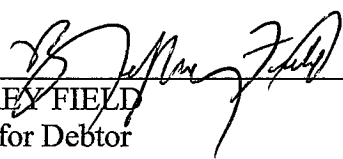
The judicial lien is avoidable under Bankruptcy Code Section 522(f).

WHEREFORE, the Debtor prays that:

a) The judicial lien filed against the Debtor in the Superior Court of Fulton County, State of Georgia on the General Execution Docket at Book 676, Page 99, on or about February 6, 2007 be avoided by this Court; and

b) The Court grant all other appropriate relief at it may deem just and appropriate in this case.

JEFF FIELD & ASSOCIATES



R. JEFFREY FIELD
Attorney for Debtor
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404-499-2700

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing "Notice of Requirement of Response to Motion to Avoid Judicial Lien on Exempt Property and Time to File Same and Motion to Avoid Judicial Lien" upon the parties listed below by placing same in a properly addressed envelope with adequate postage affixed thereto to insure delivery and deposited into the United States Mail:

Adam M. Goodman
Suite 200
260 Peachtree Street
Atlanta, Georgia 30303

Jose Angel Diaz
9110 Huntcliff Trace
Atlanta, Georgia 30350

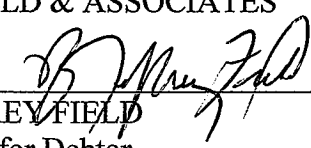
Office of the U.S. Trustee
Suite 362
75 Spring Street, SW
Atlanta, Georgia 30303

The Dillon Law Firm, PC
2775 Cruse Road
Suite 201
Lawrenceville, Georgia 30044

Louis Steven Goldman
960 Joe Frank Harris Parkway
Cartersville, Georgia 30120

This 11th day of May, 2007.

JEFF FIELD & ASSOCIATES



R. JEFFREY FIELD
Attorney for Debtor
State Bar No. 259670

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404-499-2700